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Maia Bellon
Director of Ecology
PO Box 47600
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July 21, 2016

Dear Director Bellon:

REC Silicon is a leading producer of advanced silicon materials, supplying high-purity polysilicon to the solar industry worldwide. Polysilicon is the raw material used to produce solar panels. The Company's proprietary FBR technology is the most energy efficient technology in making polysilicon, and the fact that the power we use is generated by hydroelectric power makes REC Silicon probably the company with the lowest carbon dioxide emission per kilogram produced. As a company working in the solar industry we are, in general, very focused on the carbon footprint of our activity and the reduction of global carbon emissions.

The Clean Air Rule doesn't recognize carbon negative companies like REC Silicon as shown in a third party report provided to Ecology previously. Penalizing companies who are part of the solution will only encourage less efficient production elsewhere in the world resulting in an increase in global emissions. Washington should encourage innovative companies that produce products that reduce global emissions.

We suggest the following changes to the proposed Clean Air Rule:

- Allow companies that can show carbon negativity to be exempt from the rule.
- Recognize and reward companies who utilize best technology in their industry by limiting their reduction requirements. As explained by Ecology in public webinar, the proposed rule appears to recognize energy efficiency but it is not clear how this is accomplished or what this recognition means. Although recognizing and rewarding energy efficiency is the right direction, we would suggest that this component of the rule be more clearly defined.
- The prior draft of the Clean Air Rule provided relief to emitters that suffer economic hardship. The current draft rule does not appear to contain any such relief. We would suggest that economic hardship be recognized as a temporary exemption to the rule provided that any relief be predicated upon demonstration of defined criteria. Qualifying criteria should be such that an emitter could qualify for relief without being bankrupt or no longer a going concern.

The proposed Clean Air Rule should contain provisions that encourage renewable energy companies to produce in Washington State resulting in a reduction of global emissions.

Regards,

Tore Torvund, CEO